

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

HILLARY BRODY,

Plaintiff,

Case No. 20-cv-11663

v.

Hon. George Caram Steeh

CULTURESOURCE,  
COSTAFF H.R. SERVICES, INC., and  
WILLIAM OMARI RUSH

Defendant.

---

WEININGER LAW PLLC  
Daniel W. Weininger (P-75865)  
17118 Adrian Rd.  
Southfield, MI 48075-1948  
(248) 905-1640  
[weiningerlaw@gmail.com](mailto:weiningerlaw@gmail.com)

MILLER, CANFIELD, PADDOCK  
AND STONE PLC  
MEGAN P. NORRIS (P39318)  
NHAN T. HO (P82793)  
Attorneys for Defendant  
150 W Jefferson, Suite 2500  
Detroit, Michigan 48226  
(313) 963-6420  
[norris@millercanfield.com](mailto:norris@millercanfield.com)  
[ho@millercanfield.com](mailto:ho@millercanfield.com)

---

**DEFENDANTS' EMERGENCY MOTION FOR ORDER  
STRIKING EXHIBIT TO ANSWER TO COMPLAINT  
AND PERMITTING FILING OF UNREDACTED VERSION**

NOW COMES Defendants, CULTURESOURCE and William Omari Rush,  
through their attorneys, Miller, Canfield, Paddock and Stone, move this Honorable

Court to strike *Answer and Affirmative Defenses for Defendants CultureSource and William Omari Rush* (ECF No. 7). In support of their motion, Defendants state:

1. Defendants filed *Answer and Affirmative Defenses for Defendants CultureSource and William Omari Rush* (ECF No. 7) (“Answer”) on Friday, July 17, 2020, to which Exhibit 1 (ECF No. 7-1) was attached.

2. Defendants’ counsel inadvertently filed the unredacted version of Exhibit 1, which include Plaintiff’s social security number.

3. Upon learning of her mistake, Defendants’ counsel immediately attempted to contact to the Court’s chamber and the court clerk to remediate her error, but was unable to do so because it was outside of business hours.

4. Defendants’ counsel is apologetic to the Court and Plaintiff for her mistake.

5. Defendants ask the Court to enter an order striking the Answer (ECF No. 7), so that it is removed from the public record, and authorize the filing of the Answer with Plaintiff’s social security number redacted. A copy of the redacted Answer has been filed with the Court (ECF No. 8).

6. Defendants have obtained concurrence from Plaintiff’s counsel in this Motion.

Wherefore, Defendants request that this Court enter an emergency order (1) striking *Answer and Affirmative Defenses for Defendants CultureSource and William Omari Rush* (ECF No. 7) and direct it to be removed from the public record, and (2) permit the filing of the redacted copy *Answer and Affirmative Defenses for Defendants CultureSource and William Omari Rush* (ECF No. 8), which shall be deemed accepted as filed on July 17, 2020.

Respectfully submitted,

/s/Nhan Ho (P-82793)

Miller, Canfield, Paddock and Stone, P.L.C.

Attorneys for Defendant Westcast

150 West Jefferson, Suite 2500

Detroit, MI 48226

(313) 963-6420

[norris@millercanfield.com](mailto:norris@millercanfield.com)

Dated: July 17, 2020

**CERTIFICATE OF SERVICE**

I hereby certify that on July 17, 2020, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system which will send notification of such filing to all attorneys of record.

/s/Nhan Ho

Miller, Canfield, Paddock and Stone, P.L.C.  
*Attorneys for Defendant Wescast Industries, Inc.*  
150 West Jefferson, Suite 2500  
Detroit, Michigan 48226  
(313) 963-6420  
P-82793  
[ho@millercanfield.com](mailto:ho@millercanfield.com)